

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA :

-v-

JASON SANTANA,

Defendant.

07 CRIM 1031

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COUNT ONE

The United States Attorney charges:

1. From at least in or about 2005, up to and including in or about August 2007, in the Southern District of New York and elsewhere, JASON SANTANA, the defendant, and others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1955.

2. It was a part and an object of the conspiracy that JASON SANTANA, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did conduct, finance, manage, supervise, direct, and own all and part of an illegal gambling business, namely a business that maintained illegal video gambling machines in bars and social clubs in Queens, New York, in violation of New York State Penal Law Sections 225.00 and 225.05, and which business involved five and

more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and had remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day, in violation of Title 18, United States Code, Section 1955.

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about July 2007, in the Bronx, New York, JASON SANTANA, the defendant, met with a co-conspirator not named herein as a defendant ("CC-1") to discuss illegal video gambling activities.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. From at least in or about 2005 up to and including in or about August 2007, in the Southern District of New York and elsewhere, JASON SANTANA, the defendant, did conduct, finance, manage, supervise, direct, and own all and part of an illegal gambling business, namely a business that maintained illegal video gambling machines in bars and social clubs in Queens, New

York, in violation of New York State Penal Law Sections 225.00 and 225.05, and which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day.

(Title 18, United States Code, Section 1955.)


MICHAEL J. GARCIA
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United States Attorney